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11 Attorneys for Defendant
GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,
16 Plaintiffs,
17 v.
18 GOOGLE INC.,
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF RENNY HWANG IN
SUPPORT OF ORACLE INC.'S
ADMINISTRATIVE MOTION TO SEAL
ORACLE'S RESPONSE TO ECF NO. 1598
[ECF NO. 1629]**

Dept. Courtroom 8, 19th Fl.
Judge: Hon. William Alsup

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. ("Google"), where I have served as
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well
5 as familiarizing myself with the areas of Google's businesses and documentation concerning
6 those businesses as they relate to litigation matters under my supervision. I submit this
7 declaration in support of Oracle's Administrative Motion to File Under Seal Oracle's Response to
8 ECF No. 1598 (ECF No. 1629). I have knowledge of the facts set forth herein, and if called upon
9 as a witness, I could testify to them competently under oath.

10 2. I have reviewed Oracle's Response to ECF No. 1598. The following portions
11 contain sensitive information related to the confidential terms of Google's agreement with third
12 parties.

13 • Page 7, line 22: contains third-party agreement terms and details which are
14 not public.

15 • Page 8, lines 22-24: contain third-party agreement terms and details which
16 are not public.

17 3. The information relating to third-party agreements that is quoted, discussed, and/or
18 summarized in the passages above is subject to stringent confidentiality requirements contained
19 within the relevant agreement. Indeed, Google places strict limits on who has access to the terms
20 of these agreements to ensure confidentiality is retained. Also, Google does not disclose this
21 information to the public. Public disclosure of this information could severely and adversely
22 impact Google's ability to negotiate, among other things, similar terms with other third parties in
23 connection with similar agreements now or in the future. Google only seeks to seal the specific
24 numbers and partner names in the above listed portions.

25 4. These narrowly tailored portions of Oracle's Response to ECF No. 1598 should
26 therefore be sealed.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

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4 Executed this 15th day of April, 2016 at Sunnyvale, California.

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7 By:



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RENNY HWANG